

The Court hereby adopts
the proposed case
management dates.

IT IS SO ORDERED.

s/ David A. Ruiz

U.S. Magistrate Judge

5/24/2019

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

JAMES EVERETT SHELTON; individually
and on behalf of those similarly situated,

Plaintiffs,

v.

DIRECT ENERGY, LP, and KAA ENERGY,
INC.

Defendants.

Case No. 1:19-cv-81-JG

JOINT STATUS REPORT

Pursuant to the Court's instructions at the Status Hearing on Thursday, May, 16, 2019, Defendants Direct Energy, LP ("Direct Energy"), KAA Energy ("KAA"), and Plaintiff James Everett Shelton ("Shelton") jointly file this Status Report to update the Court as to the agreed timelines for discovery and related dispositive motions. The parties have agreed as follows:

1. Discovery on individual liability, including consent, is permitted for the next 90 days until August 19, 2019;
2. On August 19, 2019, class discovery is permitted. Individual discovery continues, as necessary.
3. The parties will pass on the June 22, 2019 dispositive motion deadline for "consent issues." Defendants will file any motion for summary judgment on all potentially dispositive issues by the Dispositive Motion deadline below.
4. The Parties propose that the Court enter the following deadlines:

DEADLINE:

PROPOSED DATE

Fact discovery deadline

February 19, 2020

Plaintiff's expert report deadline

March 20, 2020

Defendants' expert report deadline

April 20, 2020

Expert discovery deadline

May 20, 2020

Motion for class certification deadline

June 3, 2020

Dispositive Motion deadline

30 days after the Court's ruling
on Plaintiff's motion for class
certification

Dated: May 22, 2019.

By: /s/ William B. Thomas

Michael D. Matthews, Jr.*
Texas Bar No. 24051009
William B. Thomas*
Texas Bar No. 24083965
McDowell Hetherington, LLP
1001 Fannin Street, Suite 2700
Houston, Texas 77002
T: (713) 337-5580
F: (713) 337-8850
matt.matthews@mhlhp.com
william.thomas@mhlhp.com

Ashley L. Olikier (0085628)
Frost Brown Todd LLC
10 W. Broad Street, Suite 2300
Columbus, Ohio 43215
T: (614) 559-7227
F: (614) 464 1737
aoliker@fbtlaw.com

Attorneys for Direct Energy, LP

** admitted pro hac vice*